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HUB LAW OFFICES

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF MARIN

12 CHURCH OF SCIENTOLOGY OF) Case No. 152 229
13 INTERNATIONAL, a California)
not-for-profit religious) EVIDENTIARY OBJECTIONS TO THE
14 corporation;) EVIDENCE IN SUPPORT OF DEFENDANT'S
15) OPPOSITION TO PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION
16)
Plaintiff,)
17)
vs.)
18)
GERALD ARMSTRONG and DOES 1)
19 through 25, inclusive,)
20 Defendants.) DATE: March 20, 1992
TIME: 9:00 a.m.
DEPT: 4
21

22 Plaintiff, Church of Scientology International (hereinafter
23 "the Church") hereby submits the following evidentiary objections
24 to the exhibits submitted by defendant Gerald Armstrong in
25 support of defendant's opposition to plaintiff's motion for
26 preliminary injunction. Pursuant to these evidentiary
27 objections, and the accompanying memorandum of points and
28 authorities, plaintiff respectfully requests that each and every

1 item submitted by Armstrong be deemed inadmissible and
2 disregarded by this Court, for purposes of this hearing and for
3 all future purposes.

4 Plaintiff furthermore objects to each and every item of
5 evidence proffered by Armstrong, on the grounds that it is
6 inadmissible, incompetent, without preliminary or foundational
7 facts, unauthenticated, hearsay, argumentative, incompetent
8 opinion evidence, proffered in violation of the best evidence
9 rule, and is devoid of any probative value consistent with
10 section 352 of the California Evidence Code.

11 SPECIFIC OBJECTIONS :

12 1. Plaintiff objects to the admission of Exhibits I-B, I-D,
13 I-D-1, I-D-2, I-E, I-F, I-F-1, I-G, I-H, I-J, I-K, I-L, I-M, I-N,
14 I-O, I-P, I-S, I-T, I-X, and I-Y. These exhibits are all
15 documents which are part of the record ordered sealed as part of
16 the settlement of Armstrong I. This sealing order, issued by
17 Judge Breckenridge, was upheld by the Court of Appeal. Church of
18 Scientology of California v. Armstrong (1991), 232 Cal.App.3d
19 1060, 283 Cal.Rptr. 917.

20 2. Plaintiff objects to Exhibit I-A on the grounds it is
21 (1) inadmissible; (2) incompetent; (3) without preliminary or
22 foundational facts; (4) is comprised of improper hearsay,
23 argument, and incompetent opinion evidence; (5) lacks relevance;
24 (6) addresses matters not within the affiant's personal
25 knowledge; and (7) is devoid of any probative value pursuant to
26 California Evidence Code § 352.

27 3. Plaintiff objects to Exhibit I-MM on the grounds it is
28 (1) inadmissible; (2) incompetent; (3) without preliminary or

1 foundational facts; (4) is comprised of improper hearsay,
2 argument, and incompetent opinion evidence; (5) lacks relevance;
3 (6) addresses matters not within the affiant's personal
4 knowledge; and (7) is devoid of any probative value pursuant to
5 California Evidence Code § 352.

6 4. Plaintiff objects to Exhibit II on the grounds it is
7 (1) inadmissible; (2) incompetent; (3) without preliminary or
8 foundational facts; (4) is comprised of improper hearsay,
9 argument, and incompetent opinion evidence; (5) lacks relevance;
10 (6) addresses matters not within the affiant's personal
11 knowledge; and (7) is devoid of any probative value pursuant to
12 California Evidence Code § 352.

13 5. Plaintiff objects to Exhibit III on the grounds it is
14 (1) inadmissible; (2) incompetent; (3) without preliminary or
15 foundational facts; (4) is comprised of improper hearsay,
16 argument, and incompetent opinion evidence; (5) lacks relevance;
17 (6) addresses matters not within the affiant's personal
18 knowledge; and (7) is devoid of any probative value pursuant to
19 California Evidence Code § 352.

20 6. Plaintiff objects to Exhibit IV on the grounds it is
21 (1) inadmissible; (2) incompetent; (3) without preliminary or
22 foundational facts; (4) is comprised of improper hearsay,
23 argument, and incompetent opinion evidence; (5) lacks relevance;
24 (6) addresses matters not within the affiant's personal
25 knowledge; and (7) is devoid of any probative value pursuant to
26 California Evidence Code § 352.

27 7. Plaintiff objects to Exhibit V on the grounds it is (1)
28 inadmissible; (2) incompetent; (3) without preliminary or

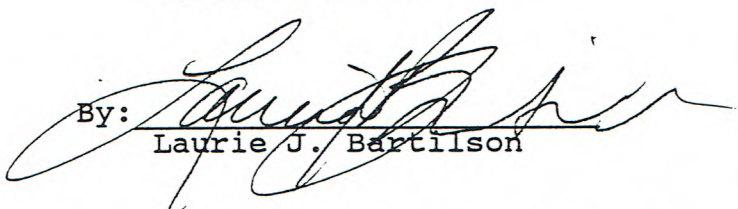
1 foundational facts; (4) is comprised of improper hearsay,
2 argument, and incompetent opinion evidence; (5) lacks relevance;
3 (6) addresses matters not within the affiant's personal
4 knowledge; and (7) is devoid of any probative value pursuant to
5 California Evidence Code § 352.

6 Plaintiff respectfully requests that the Court sustain
7 plaintiff's objections and that each and every item specified in
8 the above objections be deemed inadmissible and disregarded by
9 this Court, for purposes of this hearing and for all future
10 purposes.

11 Dated: March 19, 1992

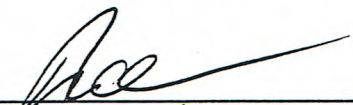
Respectfully submitted,

12 BOWLES & MOXON

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16 WILSON, RYAN AND CAMPILONGO

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